

Case No.: 6:19-cr-00829-TMC

As of the filing of this motion, the jail is now allowing limited and restricted visitation. Specifically, any attorney or doctor visit must be held where the parties are in separate rooms divided by glass. One of the rooms used would be the booking room. The booking room is accessible by the entire jail staff and has regular foot traffic. Any visit must be in the presence of one to two jail officers. It is counsel's position that these conditions are not conducive to effective

and meaningful communication with the defendant nor are they appropriate for a psychological evaluation.

Based upon the foregoing circumstances, counsel needs additional time to discuss the case with the defendant, complete a psychological evaluation of defendant, and negotiate a resolution of the case with the Assistant United States Attorney. For these reasons, defendant requests the trial of this case be continued.

Defense counsel represents to the Court that he has discussed this continuance with the defendant, her waiver of rights under the Speedy Trial Act, and she consents to a continuance. She has acknowledged that she understands that the time occasioned by this delay shall be excluded from consideration under 18 U.S.C. §3161, et seq., The Speedy Trial Act.

Respectfully submitted,

s/S. Harrison Saunders, VI  
S. Harrison Saunders, VI (Fed I.D. 9122)  
3104 Devine Street  
Columbia, South Carolina 29205  
[Harrison@HSaundersLaw.com](mailto:Harrison@HSaundersLaw.com)  
(803) 779-6333 Facsimile: (803) 724-2601

ATTORNEY FOR THE DEFENDANT

July 22, 2020